



August 11, 2011

Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Comments on Docket No. 11-109  
*LightSquared Subsidiary LLC Request for Modification of its Authority for an Ancillary Terrestrial Component*

NUCA, representing utility and excavation contractors, is a family of more than 1,000 companies across the nation that build, repair and maintain underground water, wastewater, gas, electric and telecommunications systems. NUCA appreciates the opportunity to submit comments on the Federal Communications Commission (FCC) request for feedback on the findings of the Technical Working Group (TWG) study on the January 2011 order granting LightSquared, LLC a waiver to test whether its proposed terrestrial network would cause significant interference to Global Positioning Systems (GPS).

The results of the TWG's three-month review are clear. LightSquared's proposed network will cause harmful interference to GPS receivers, demonstrating the need to prevent LightSquared's proposal from moving forward because of the tremendous threats it presents. This interference would impose devastating economic and safety impacts on the underground utility construction and excavation industry at a time when it simply cannot afford it.

Utility and excavation contractors use GPS technology in their everyday work to map and survey construction sites and facilitate excavation and grading activities. GPS enhances worker safety, reduces project delays and creates an overall efficient worksite by providing real-time monitoring for equipment maintenance and preventing equipment theft.

Perhaps most important to our industry, GPS plays a significant role in identifying underground facilities prior to excavation. Damage to underground utilities such as gas distribution mains or certain telecommunication lines that serve critical facilities including hospitals and military facilities can be catastrophic. Damage prevention is a shared responsibility and the process requires all viable methods and technology available to accurately identify underground facilities prior to digging. Therefore, any interference with GPS would be extremely disruptive to the many functions it serves on construction sites.

The construction industry continues to be the hardest hit by the economic challenges facing the nation over the past few years, currently experiencing more than 13% unemployment with many struggling to stay in business. Utility and excavation contractors have made significant investments in GPS technology to modernize and improve today's construction sites, equipment and processes. Disruption to this service will inevitably obstruct the industry's economic recovery efforts.

For these reasons we ask the FCC not allow LightSquared to proceed with its plan.

Regards,

Ryan Schmitt  
Chairman, NUCA